

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
ONE MANHATTAN WEST  
NEW YORK, NY 10001

TEL: (212) 735-3000

FAX: (212) 735-2000

www.skadden.com

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DIRECT DIAL  
(212) 735-2588  
DIRECT FAX  
(917) 777-2588  
EMAIL ADDRESS  
JESSICA.DAVIDSON@SKADDEN.COM

February 7, 2024

**VIA ECF**

The Hon. Robert B. Kugler  
United States District Judge  
USDJ, District of New Jersey  
Mitchell H. Cohen Building  
& U.S. Courthouse  
4th & Cooper Streets, Room 1050  
Camden, NJ 08101

RE: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*, No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Judge Kugler:

I write on behalf of defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”), to request an extension of seven (7) days, until February 20, 2024, to submit the ZHP Defendants’ reply in support of their motion to amend and correct the Court’s January 5, 2024 opinion excluding in part several of the parties’ liability experts’ opinions and to respond to plaintiffs’ response and cross-motion regarding same. (*See generally* ECF Nos. [2581](#), [2591](#), [2626](#).)

Given the pressing nature of trial preparation efforts, as well as the fact that plaintiffs’ filing includes a cross-motion to exclude additional expert testimony, the ZHP Defendants require additional time beyond the seven (7) days contemplated for a reply to prepare a response. The ZHP Defendants have consulted with counsel for plaintiffs, who consent to this request.

Thank you in advance for your consideration.

The Honorable Robert B. Kugler  
February 7, 2024  
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Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Jessica Davidson".

Jessica Davidson

cc: All counsel of record (via ECF)